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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CALIFORNIA COALITION FOR WOMEN
PRISONERS et al.,

Plaintiffs,

v.

UNITED STATES OF AMERICA FEDERAL
BUREAU OF PRISONS et al.,

Defendants.

Case No. 4:23-cv-04155-YGR

**PLAINTIFFS' EXHIBIT LIST FOR
EVIDENTIARY HEARING ON
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

Judge: Hon. Yvonne Gonzalez Rogers

Trial Date: None Set

Plaintiffs respectfully provide the following witness list for the Preliminary Injunction

Evidentiary Hearing. Plaintiffs may affirmatively call the following individuals to testify live at the evidentiary hearing calendared to begin on January 3, 2024.

Exhibit Number	Date	Description	Sponsoring Witness	Stipulation To Admit	Plaintiff's Objections	Defendant's Objections	Date Admitted
PIX-001	3/15/2023	Admin Remedy Response to J.M. ¹ , Lost Grievance	J.M.				
PIX-002	3/20/2023	Admin Remedy Response to J.M.	J.M.				
PIX-003	5/10/2023	J.M., Appeal	J.M.				
PIX-004	6/28/2023	J.M., Appeal Disregard Receipt	J.M.				
PIX-005	11/2/2023	J.M. Grievance re Unassignment	J.M.				
PIX-006	9/25/2023	J.M. Grievance re Unassignment	J.M.				
PIX-007	9/28/2023	J.M. Grievance	J.M.				
PIX-008	11/1/2023	J.M. Grievance	J.M.				
PIX-009	6/14/2023	J.M. Grievance	J.M.				
PIX-010	7/26/2023	Response to Grievance	J.M.				
PIX-011	6/2/2023	Receipt of appeal for PREA	J.M.				
PIX-012	6/26/2023	Rejected grievance for PREA	J.M.				
PIX-013	9/28/2023	Incident Report	K.D.				
PIX-014	9/23/2023	Email to Psychology	K.D.				
PIX-015	12/1/2023	Incident Report	C.A.H.				
PIX-016	10/26/2023	Drug use/commissary limit memo	R.B.				
PIX-017	Undated	Outdoor yard use memo	R.B.				

¹ Dkt. No. 17 granted Plaintiffs' application to proceed using initials only. The individual inmates' full names have been disclosed to counsel for Federal Defendants but will not be used in Court.

Exhibit Number	Date	Description	Sponsoring Witness	Stipulation To Admit	Plaintiff's Objections	Defendant's Objections	Date Admitted
PIX-018	12/18/2023	New Warden announcement	R.F.				
PIX-019	12/15/2023	R.F. email to Deveney	R.F.				
PIX-020	12/18/2023	R.F. email to Nash	R.F.				
PIX-021	10/15/2023	R.F. email to Deveney	R.F.				
PIX-022	8/24/2022	R.F. health services	R.F.				
PIX-023	9/28/2023	Custody Classification	R.F.				
PIX-024	10/26/2023	Drug use/commissary limit memo	R.F.				
PIX-025	Undated	Outdoor yard use memo	R.F.				
PIX-026	11/30/2023	Victim Impact Statement	A.H.R.				
PIX-027	12/4/2023	Incident Report	A.H.R.				
PIX-028	11/6/2023	Suicide Watch Companion Schedule	A.H.R.				
PIX-029	12/5/2023	Incident Report	K.R.P.				
PIX-030	4/6/2023	Pilot phone memo	R.B.				
PIX-031	4/5/2023	Privacy Screens memo	R.B.				
PIX-032	1/23/2023	Response to Grievance	R.B.				
PIX-033	11/27/2023	R.B. - Grievance	R.B.				
PIX-034	12/5/2022, 11/30/2022	R.B. - Email Thread	R.B.				
PIX-035	3/17/2023	J.L. - Admin Remedy Response	J.L.				
PIX-036	6/21/2023	J.L. - Receipt of admin remedy	J.L.				
PIX-037	8/29/2023	M.M. - Admin Remedy	M.M.				

Exhibit Number	Date	Description	Sponsoring Witness	Stipulation To Admit	Plaintiff's Objections	Defendant's Objections	Date Admitted
PIX-038		Intentionally Omitted					
PIX-039	11/7/2023	F.V.G.B. Email	F.V.G.B.				
PIX-040	12/10/2023	F.V.G.B. Email	F.V.B.G.				
PIX-041	12/17/2023	F.V.G.B. Email	F.V.G.B.				
PIX-042	12/17/2023	F.V.G.B. Email	F.V.G.B.				
PIX-043	10/15/2023	F.V.G.B. Med Request	F.V.G.B.				
PIX-044	10/16/2023	F.V.G.B. Letter to OIG	F.V.G.B.				
PIX-045	11/23/2023	Declaration of Morgan Agostini, ECF No. 45-4	Agostini, Morgan				
PIX-046	2/15/2023	Notification Procedures: PREA Allegations Outside Hospital, ECF No. 46-3	Agostini, Morgan Deveney, Patrick				
PIX-047	10/18/2022	Memorandum For FCI And Camp Inmate Population re Electronic Communications, ECF No. 46-4	Agostini, Morgan				
PIX-048	Undated	Tri-Valley Haven Memorandum, ECF No. 46-5	Mulcahy, Alison				
PIX-049	11/18/2020	Inmate Discipline Program No. 5270.09, CN-1, ECF No. 46-6	Agostini, Morgan Deveney, Patrick				
PIX-050	Undated	BOP Confiscation Forms, BP-A0402, ECF No. 46-7	Agostini, Morgan Deveney, Patrick				

Exhibit Number	Date	Description	Sponsoring Witness	Stipulation To Admit	Plaintiff's Objections	Defendant's Objections	Date Admitted
PIX-051	1/19/2023	Access to Legal Counsel at FCI Dublin Letter, ECF No. 46-8	Agostini, Morgan				
PIX-052	4/3/2023	Allegations of Unconstitutional Conditions & Ongoing Sexual Assault at FCI Dublin Letter, ECF No. 46-9	Agostini, Morgan				
PIX-053	4/6/2023	Notice re Pilog Program - Dedicated Phone Line, ECF No. 46-10	Agostini, Morgan				

Plaintiffs reserve the right to amend this exhibit list, and to add any and all exhibits necessary to address or rebut matters put into evidence by Defendants.

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DATED: December 29, 2023

Respectfully submitted,

RIGHTS BEHIND BARS
CALIFORNIA COLLABORATIVE FOR
IMMIGRANT JUSTICE
ROSEN BIEN GALVAN & GRUNFELD LLP
ARNOLD & PORTER KAYE SCHOLER LLP

By: /s/ Kara J. Janssen

Kara Janssen

Attorneys for Plaintiffs